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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-5944 SC

MDL. No. 1917

This Document Relates to:

Sharp Elecs. Corp. v. Hitachi, Ltd., No. 13-cv-01173

**DECLARATION OF MOLLY M.
DONOVAN IN SUPPORT OF THE
SHARP PLAINTIFFS'
ADMINISTRATIVE MOTION TO
SEAL DOCUMENTS PURSUANT TO
CIVIL LOCAL RULES 7-11 AND 79-5**

[re Panasonic Documents]

1 I, Molly M. Donovan, declare as follows:

2 1. I am an attorney with Winston & Strawn LLP, counsel for Defendants Panasonic
3 Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a
4 Matsushita Electric Industrial Co., Ltd.) (collectively, the “Panasonic Defendants”) in these actions.
5 I am a member of the bar of the State of New York and I am admitted to practice before this Court
6 *pro hac vice*. Except for those matters stated on information and belief, about which I am informed
7 and which I believe to be true, I have personal knowledge of the facts stated herein and, if called as a
8 witness, I could and would competently testify thereto.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter
10 (Dkt. 306). On October 28, 2013, Plaintiffs Sharp Electronics Corporation and Sharp Electronics
11 Manufacturing Company of America, Inc. (collectively, “Sharp”) filed an Administrative Motion to
12 Seal (Dkt. 2030), and lodged conditionally under seal, pursuant to Civil Local Rules 7-11 and 79-
13 5(d), portions of Sharp’s First Amended Complaint (“FAC”) that contain information from
14 documents or deposition testimony that the Panasonic Defendants have designated “Confidential” or
15 “Highly Confidential.”

16 3. Pursuant to Civil Local Rule 79-5(d), I make this declaration on behalf of the
17 Panasonic Defendants to provide the basis for the Court to maintain under seal certain documents
18 and information quoted from, described, or otherwise summarized in the FAC that have been
19 designated by the Panasonic Defendants as “Confidential” or “Highly Confidential” pursuant to the
20 Stipulated Protective Order.

21 4. The documents and information quoted from, described, or otherwise summarized in
22 Paragraphs 196, 197, 198, 239 and 240 of the FAC consist of, cite to, or identify confidential,
23 nonpublic, proprietary, and highly sensitive business information about the Panasonic Defendants’
24 business practices, pricing practices, confidential business agreements and competitive positions.
25 The documents describe relationships with companies that remain important to the Panasonic
26 Defendants’ competitive position. I am informed and believe that this is sensitive information and
27 public disclosure of this information presents a risk of undermining the Panasonic Defendants’
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business relationships, would cause it harm with respect to its competitors and customers, and would put the Panasonic Defendants at a competitive disadvantage.

5. Paragraphs 196, 197, 198, 239 and 240 of the FAC quote from or describe documents, testimony or information designated as “Confidential” or “Highly Confidential” by the Panasonic Defendants pursuant to the Stipulated Protective Order. I understand that the Panasonic Defendants consider any statements in the FAC purporting to summarize any documents or information designated “Confidential” or “Highly Confidential” by the Panasonic Defendants confidential and proprietary. I am informed and believe that the Panasonic Defendants have taken reasonable steps to preserve the confidentiality of information of the type contained, identified, or cited to in Paragraphs 196, 197, 198, 239 and 240 of the FAC.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: November 1, 2013

By: /s/ Molly M. Donovan
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